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5 Attorneys for Defendant
6 RYAN JAY ROSENTHAL

7
8 United States District Court
Northern District of California
9

10 UNITED STATES OF AMERICA,) CR No. 4:17-CR-00133-JST
11 Plaintiff,) STIPULATION AND ~~PROPOSED~~ ORDER
12 v.) CONTINUING STATUS CONFERENCE
13 RYAN JAY ROSENTHAL,)
14 Defendant.)
15

16 Defendant RYAN JAY ROSENTHAL, by and through his counsel
17 undersigned and the United States of America, through Assistant
18 United States Attorney MEREDITH OSBORN, hereby stipulate and
19 respectfully request that the Court vacate the Status Conference
20 hearing in the above captioned case, currently set for Friday,
21 April 28, 2017, at 09:30 a.m., and reset it for Friday, May 26,
22 2017, at 09:30 a.m.

23 This is the parties' first request to continue the Status
24 Conference. The parties last appeared before the Court on
25 Tuesday, March 28, 2017, before the Honorable Kandis A. Westmore
26 for a Detention Hearing, at which time the defendant was taken
27 into custody and the current Status Conference date of Friday,
28

1 April 28, 2017 was set.

2 Discovery from the government is substantially complete. The
3 requested continuance is necessary to allow defense counsel more
4 time to review the discovery and to research, evaluate and
5 investigate applicable defenses and to conduct potential further
6 investigation. Additionally, ROBERT J. BELES, the primary counsel
7 for the defendant is unavailable from Friday, April 28, 2017
8 through Monday, May 1, 2017 due to a pre-paid vacation.

9 The parties further stipulate and agree that the time between
10 Friday, April 28, 2017 and Friday, May 26, 2017, should be
11 excluded from computation of the time for commencement of trial
12 under the Speedy Trial Act and that the ends of justice are served
13 by the Court excluding such time in order to allow defense counsel
14 the reasonable time necessary for effective preparation, taking
15 into account the exercise of due diligence, and continuity of
16 counsel. 18 U.S.C. § 3161 (h) (7) (A) and (B) (iv).

17 For these reasons, the defendant, defense counsel, and the
18 government stipulate and agree that the interests of justice
19 served by vacating the Status Conference currently set for Friday,
20 April 28, 2017 at 09:30 a.m. and resetting it for Friday, May 26,
21 2017, at 09:30 a.m. outweigh the best interests of the public and
22 the defendant in a speedy trial. 18 U.S.C. § 3161 (h) (7) (B)
23 (iv); 18 U.S.C. § 3161 (h) (7) (B) (ii).

24

25 **IT IS SO STIPULATED.**

26

Respectfully submitted,

27

DATED: April 18, 2017

28

/s/ RJB
ROBERT J. BELES,

Attorney for *RUSSELL PFIESTER*

DATED: April 18, 2017

/s/ ES
ELLIOT SILVER,
Attorney for *RUSSELL PFIESTER*


DATED: April 18, 2017

/s/ MO
MEREDITH OSBORN,
Assistant U.S. Attorney

BRIAN STRETCH
United States Attorney

IT IS SO ORDERED.

DATED: April 18, 2017 _____



HON. JON S. TIGAR
UNITED STATES DISTRICT JUDGE